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Document	Section	Comment	Assessment
AR	1	Purpose (Pg 2): The purpose statement supports comment 1 in that it appears to limit the management structure to the integration of the Army enterprise solutions.	**Not Accepted**
AR	2	Add the Clinger-Cohen Act of 1996. Reason: Key statutory guidance on information technology expenditures.	**Accepted**
AR	2.2.b	Referenced publications in accordance with AR 25-30, are required to be listed in Appendix A. The paragraph should say that required and related publications are listed in Appendix A when there are this many. This should be labeled 1-2, not 2b and should be title References. In the DA PAM you have this as section 3, it should be 1-2 here as well. There should also be statement in the references section on prescribed forms stating that these are in Section III and that referenced forms are in Section IV. If there are no prescribed forms by the regulation. If the section has no entry, i.e. no prescribed forms you should state that. The appendix A, sections on prescribed and referenced forms and the glossary are mandatory. There should be a statement in the first two chapters that refers the reader to the glossary. It should state that "Abbreviations and special terms used in this regulation are explained in the glossary."	**Accepted**
AR	3	(First Paragraph) Need to address spiraling capabilities in the Current Force as the Army moves to the Future Force.	**Accepted**
AR	3	Recent GAO reports and testimony regarding business transformation in the DoD have recommended that modernization efforts should be organized along domains, rather than by traditional organizational structure, and even that budget appropriations be similarly structured. The proposed Army Transformation Governance Structure, presented in Table 2 and described in detail in the text, seems appropriately modeled on the mission/domain structure prescribed by DoD. The Army's proposed structure follows the DoD model, but almost exclusively emphasizes coordination between various parts of the Army, rather than between Army and DoD. The governance model could be more explicit about focusing the scope and potential impact of modernization efforts beyond Army operations. While responsibilities of the Domain Governance Boards include "collaborate with OSD domain counterparts*," there is a significant difference between synchronizing efforts with DoD and integrating them. Army has an opportunity in several of its high-profile modernization efforts, (e.g., LMP), to establish a solution applicable for all of DoD.*	**Not Accepted**
AR	3.a	In Table 1. Expand the governance structure, which defines domain owners at the secretariat level, to include domain executives at the Army staff level. (Accounting and Finance and Strategic Planning and Budget-ASA FM&C/G8; Human Resource Management/G1; Acquisition/G3; Installations and Environment/ACSIM; Logistics/G4).	**Accepted**
AR	3.c	State which organizations own the Army Business Domains by narrative in this paragraph or through	**Accepted**

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Document	Section	Comment	Assessment
		pointing to a Table of Army Business Domain owners. Reason: Need to clarify responsible organizations.	
AR	3.d	List out the five Joint Functional Capabilities.	**Accepted**
AR	3.d	Delete this para and replace with: "*In the Warfighting Mission Area, TRADOC, as the Army's Operational Architect, translates joint operating and functional concepts into warfighting capabilities and is <u>the lead agent</u> for the transformation of the Army's Operating Forces. Responsibilities include integrating operational architectures, synchronizing experimentation and developing future force DOTMLPF required capabilities. The Commander, TRADOC is the functional proponent for Army Battle Command and is defining the Army Battle Command Operational Architecture.* Working in cooperation and collaboration with the other Executive Architects, TRADOC is responsible for ensuring the Operational Views (OVs) are integrated with the appropriate System Views (SVs) and Technical Views (TVs). These integrated architectures support the refinement of warfighting concepts that constitute the front end of JCIDS and underpin the entire JCIDS process."	**Accepted** Will add italic text
AR	3.d	State the five Joint Functional Capabilities. Reason: Clarity	**Not Accepted**
AR	3.e	State the G-2 has Army ownership of the Intelligence Mission Area. Reason: Clarity and in accord with statements made in paragraph 5e.	**Accepted**
AR	3.f	State that the CIO/Army G-6 has Army ownership of the Enterprise Information Environment (EIE) Mission Area. Reason: Clarity and in accord with statements made in paragraph 5g.	**Accepted**
AR	3.g	What in implied by stating that AEIOO is the "primary link to BMMP"? This is a broad statement requiring specific definition	**Not Accepted**
AR	3.g	Does the reference to "Army Staff" include the Secretariat? It did not used to. Used to be ARSTAF was CSA and down, HQDA included the Secretariat. Need to be more specific. Same comment applies in Table 2, third row, second bullet ("Army Staff").	**Accepted**
AR	3.g	Table 2 (Pg 5): Where does AEIOO fit into the governance model? It looks like they are not identified in the Army Transformation Governance Structure.	**Accepted**
AR	4.a	Need to link this statement to Joint and Interdependent.	**Not Accepted**
AR	4.c	We suggest that the Government consider adding "Coalition Partners" to the discussion (where appropriate).	**Accepted**
AR	4.f	In reference to FOAs, why these and not MACOMS and SSA?	**Accepted**
AR	5.a	Does AEIOO have an executive sponsor to force integration and guidance?	**Not Accepted**

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AR	5.a.1	Suggest there may be Army governance bodies already established that can fulfill this requirement (i.e. Army Review Council, Army Strategic Planning Council etc.). Using already established bodies will make better use of senior leadership's valuable time and effort.	**Not Accepted**
AR	5.a.2	The Secretary of the Army accomplishes this responsibility through the ACP which is a living document. This subparagraph should be structured based on the ACP.	**Accepted**
AR	5.a.2	The Secretary of the Army accomplishes this responsibility through the Army Campaign Plan. This subparagraph should be restructured based on the Army Campaign Plan.	**Accepted**
AR	5.b	General comment about major task heading ASA FM&C and others all end in "will". It seems a bit directive in nature and inflammatory given that there are clear actions listed under the specified tasks. Only organization without a "will" is Sec Army.	**Not Accepted**
AR	5.b	(Bullet 6) How does the establishment and framework to plan and execute business transformation coordinate with the IMA board of directors, NETCOM or ACSIM? It appears that each of these entities are executing business transformation initiatives (i.e. IMA BPA for BPR). Does AEIOO have a role in these organizations? If they want a lead or supporting role, it will dictate the tone within the Army staff.	**Not Accepted**
AR	5.b	General comment on the number of coordination and facilitation tasks listed. Is AEIOO staffed to provide support for this level of involvement with the number of interfaces listed? Seems that they are portraying a central C2 node for anything enterprise within the Army. Is that a salient position for AEIOO?	**Not Accepted**
AR	5.b.11	This paragraph needs to be deleted or focused at some "value added" contribution which can be made by AEIOO. At most, AEIOO should provide the PEO/PM with the developed methodology. Implementation is a PEO/PM level activity.	**Not Accepted**
AR	5.b.2	"while ~~sustaining~~ improving support to current…"	**Accepted**
AR	5.b.3	"direct relationships ~~between~~ among warfighting…"	**Accepted**
AR	5.b.7	This AEIOO responsibility needs to be rewritten. The Domain architectures will include operational and system architectures. This is a HQDA G6 AAIC responsibility. The Domain operational architectures are part of the Army operational architectures. Are we requiring "consistency", compliance, or integration at the process level? Additionally, what value does AEIOO add for "facilitating coordination" between CIO/G-6 and the Domains if the CIO/G6 is responsible for that coordination?	**Not Accepted**
AR	5.b.7	Change CIO/G-6 to G-3. Although the G-6 has statutory responsibilities under the Clinger-Cohen Act, the G-3 is the Chief or Master Architect overseeing and directing development of operational	**Not Accepted**

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Document	Section	Comment	Assessment
		architectures.	
AR	5.b.7	The AEIOO responsibility should be rewritten. The Domain architectures will include operational and system architectures. The Domain operational architectures are part of the Army operational architectures.	**Not Accepted**
AR	5.b.7	Drop "operational" from statement. Reason: The systems and technical architectures must hold equal weigh with that of the operational.	**Accepted**
AR	5.b.9	Change CIO/G-6 to G-3.	**Accepted**
AR	5.c.1.g	Ensure domain owners obtain all required approvals before what?	**Accepted**
AR	5.c.1.g	Recommend adding CIO compliance approval with regards to Clinger-Cohen	**Accepted**
AR	5.c.4	Doesn't the IT Exhibit require both CFO and CIO endorsements?. Recommend adding language for dual endorsement.	**Not Accepted**
AR	5.d	What about LOG?	**Not Accepted**
AR	5.d	Add a sub paragraph to indicate that the ASA (ALT) is responsible for developing the System Architecture (SA) View that will be integrated with the Operational (OA) and Technical (TA) Views.	**Accepted** .
AR	5.d	Change "Domain subject matter experts" to "Domain owners." Reason: "Domain subject matter experts" is too vague a designation. "Domain owners" is a title being utilized in the draft regulation and has an understood meaning.	**Accepted**
AR	5.d.2	Add "G3," before CIO/G6.	**Accepted**
AR	5.f.1	Add: …"as the Army's Master Architect" after "…Council."	**Not Accepted**
AR	5.f.2	Gartner is not familiar with the Army Warfighter Mission Area Governance Board? Is the G-3 CIO supposed to ensure that Warfighter requirements are included in the creation of enterprise solutions?	**Not Accepted**
AR	5.f.4	Replace sentence with "Coordinate with Commander, TRADOC (Operational Architecture), ASA (ALT) (Systems Architecture), and CIO/G6 (Technical Architecture) for the development of battle command processes and architecture."	**Not Accepted**
AR	5.g	G-6 has several functional and domain leads that are looking at transformational issues and enterprise solutions. What is the coordination or delegation of responsibility between AEIOO and CIO-G6? Either it is clear today or it is being established through this memorandum.	**Not Accepted**
AR	5.g	Currently there is a group of Architecture development tools identified by the CIO – G6. These tools	**Not Accepted**

Document	Section	Comment	Assessment
		have compatibility issues and it is very difficult to exchange date between them. Is the AR 5-xx (paragraph 5 g.) going to have the CIO identify a recommended architecture development tool so all the architecture development organizations can readily exchange data? i. Data bases are not compatible or consistently layout. ii. Some do not work well with Doors. iii. Some will not work well exporting / importing data with each other. iv. Data is presented in different formats 1. Steep learning curves across organizations 2. High maintenance cost maintaining multi tools suites.	
AR	5.g.4	Change the word Board to Board(s). Rationale: it is talking about all boards.	**Accepted**
AR	5.g.6	This subparagraph should be moved under the G-3 in paragraph f. As the Master Architect, G-3 has the responsibility of ensuring architectures are prioritized and integrated.	**Not Accepted**
AR	5.g.7	Same comment as above. Submission of IT budget exhibits should require both CIO and CFO endorsement. Recommend adding language which states the endorsement is ICW with (ASA(ALT))	**Accepted**
AR	5.g.8	Add "and update the OSD Repository" (need to check AR 25-1 on this point).	**Accepted**
AR	5.h.2	Need to add Cost Analysis.	**Accepted**
AR	5.h.3	Ensure comptroller chop on all expenditures over $1M / comptroller prior to any approval to fund program.	**Not Accepted**
AR	5.i	Need to point to a Table of "Army Mission Area Leads." Reason: Immediate clarity of responsible parties by review of a Table.	**Accepted**
AR	5.i.2	Is the BMMP a statutory requirement? I know the appropriations acts have contained language pertinent to the BMMP, but that is "one-year" law, not a permanent statute like the CCA	**Not Accepted**
AR	5.j	The responsibility to develop a budget and resource plan as specified in Section 7 of the PAM must be given in the AR.	**Not Accepted**
AR	5.j	Need to point to a Table of "Army Domain Owners." Reason: Immediate clarity of responsible parties by review of a Table.	**Accepted**
AR	5.j.1	Add: "architectures" after "…strategies." Architectures are a key tool in analyzing gaps and redundancies and supporting Modeling and Simulation.	**Accepted**
AR	5.j.2.a	Therefore ACQN needs transformation ___ (cannot read last word in handwritten comment).	**Not Accepted**
AR	5.j.5.a	Implies that funding allocation for IT will be made at the domain owner level and dictated to the	**Not Accepted**

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Document	Section	Comment	Assessment
		MACOMs. Is this the intent? Will a resource allocation model be used to prevent lopsided resource leveling at the MACOM level?	
AR	5.j.6.b	Since the PEO/PM work directly for the AAE or the OSD MDA by law, this paragraph should be refocused or deleted.	**Not Accepted**
AR	5.j.6.b	There is no other mention of functional sponsors in the regulation. Will there be any specific authority or resources provided for this role?	**Not Accepted**
Both	General	After careful review we concur with the following comments: This is a very high level DA document with no specific reference to the ARNG. General comments are that this document is poorly written in a very technical style and the layout is very "Choppy". This makes the document very hard to understand. It definitely does not meet the Army standard of being able to be understood in a single reading.	**Not Accepted**
AR	General	First mention of Clinger Cohen act 10 pages into document. Clinger Cohen should be a guiding statutory document that governs all business transformation initiatives and should be up front in the document.	**Accepted**
AR	General	This outlines the roles and responsibilities of various organizations responsible for business transformation. How will AEIOO govern the processes outlined to the various responsible agencies? The governance memorandum does assign responsibility and describe coordinating functions, but how does AEIOO provide oversight? If they are in a governance model, should some of the task to, for example the G-3 CIO, to facilitate information back to AEIOO.	**Not Accepted**
AR	General	The chapters, paragraphs and subparagraphs of each chapter are clearly identified. The subsections of the subparagraphs are not. They should also be numbered to allow easy reference.	**Accepted**
AR	General	The AR should set out a timeline for implementation, starting with the date that it is approved.	**Not Accepted**
AR	General	Table 2. Two comments concerning the Army Transformation Executive Council: a. The charter of the proposed council needs to be clearly spelled out; OR b. This function should be assumed by an already established Army governance body.	**Accepted**
Both	General	Currently there is a strong effort to coordinate the Warfighter and Enterprise Information Environment (Tactical and Strategic) plans together into one plan. How / who is going to coordinate the additional efforts (Business and National Intelligence) together (DA Pam)?	**Not Accepted**
Both	General	There is necessarily a balance point between being too prescriptive and too general in terms of governance, processes, activities, and tools. Given the relative lack of success within the DoD to date with business modernization efforts, and the significant departure that the Army transformation framework and governance structure represent for participants, we believe the current drafts err on the side of being too generic, and that chances of success for transformation efforts would be enhanced	**Not Accepted**

Document	Section	Comment	Assessment
		with more detailed guidance and a greater level of specificity about how enterprise transformation will happen.	
AR	General	This document focuses on roles and responsibilities for the transformation activities, but it would be helpful to place these in context by describing the actual governance process in more detail as it pertains to each of the roles. Some example scenarios would be helpful, for example the responsibilities of each role for investment reviews, establishment of a target architecture and transition plan, etc.	**Not Accepted**
AR	General	Given the multi-tiered hierarchy of the proposed governance process, and the fact that it is generated first across domains, then along organizations, it might be useful to provide a visual representation of the different boards, their areas of responsibility, and expected communication paths. Equally useful would be a visual representation of points of collaboration among disparate Army organizations (which may historically have operated in a more vertical orientation) and among Army organizations and groups outside the Army, including OSD and peers in other DoD components. The type of visual representation is open to discussion, but could include familiar diagrammatic options such as organization charts, UML collaboration diagrams, or dynamic visual models.	**Not Accepted**
AR	General	There are too many governing bodies as proposed by the AR. There is to be an Army Transformation Executive Council, Mission Area Governance Boards and Domain transformation governance board. This creates too many layers to move forward in a expeditious manner to accomplish transformation. Further some of the directed responsibilities in the AR and Pam overlay current management process in the DoD 5000 series thus causing duplication of effort	**Not Accepted** .
AR	General	Portfolio management has not been addressed in this AR while it appears portfolio management that affects multiple domains is becoming the focus.	**Not Accepted**
AR	General	The draft AR 5-XXX is not synchronized with the Army Campaign Plan. For example, there are no MACOM specific roles and responsibilities listed in the draft regulation as it is in the Campaign Plan. The AR does not delegate down any authority while the Campaign Plan specifically delegated responsibilities to specific MACOMs. Further the draft AR directs the use of existing DoD and Army transformation decision process. This enforces the delegation in the Campaign Plan but not the AR.	**Accepted**
AR	General	Assume that the regulation will be approved and distributed after approval and distribution of the policy memo, "Army Enterprise Transformation Governance," (draft - 22 July 2004).	**Not Accepted**
AR	General	Recommend adding a glossary of abbreviations and terms.	**Accepted**
AR	Glossary	Abbreviations -- Need to make sure that ASA(ALT), PAED, FOA,OSD, PEO, PM and ASA(FM&C) are added.	**Accepted**
AR	Intro	Applicability (Pg 1): Does the application of this document imply that any business process or system utilized within the Army is subject to the Management of the Army Enterprise Transformation? This	**Not Accepted**

Document	Section	Comment	Assessment
		seems to imply that any weapons system & training process is included. If that is either not the intent not within the domain of AEIOO to provide governance for, then a specific context should be applied in order to eliminate any confusion.	
AR	Table 2	Expand the membership of the governance boards to include G8 to be represented on all three levels. The G8 role is to be principal advisor and integrator of the Army program.	**Accepted**
AR	Terms	Last two lines need to be moved to top of page 17.	**Not Accepted**
AR	Terms	Capitalization of Integrated Financial Management System from second paragraph.	**Accepted**
AR	Title Page	All Army programs and functions are subject to AR 11-2 and the requirement to establish and maintain effective management controls. HQDA functional proponents are also required by AR 11-2 to identify in their ARs the key management controls that require formal evaluation and every AR is to include a statement on their title page whether or not the AR identifies key management controls. This requirement is in AR 25-30, ch 3-4.	**Accepted**
AR	Various	Cosmetic Changes – see comments	**Accepted**
AR	Various	There should be a purpose paragraph in the AR titled 1-1, not 1a - b, etc. This is per DA PAM 25-40. Paragraph 1-3 is always Explanation of Abbreviations and Terms and refers the reader to the Glossary. If Responsibilities are not listed as required in 1-4, it should be indicate that they are in Chapter 2 or wherever they are located. 1-1 thru 1-4 are required to be named specific titles per DA PAM 25-40.	**Accepted**

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Document	Section	Comment	Assessment
PAM	2	First bullet: Recommend these references be reversed, since the regulation will take precedence over the memorandum, and may in fact supercede the memorandum.	**Not Accepted**
PAM	4.1	Figure 1 – why not the CSA arrow?	**Not Accepted**
PAM	4.1	Need concept of improving capabilities in alignment with Clinger Cohen Act and OMB A-11.	**Not Accepted**
PAM	5	Phase 2 – doesn't this keep changing? Need to incorporate the concept of spirals.	**Accepted**
PAM	5	The Transition Framework appears to be organized in a "waterfall" structure. This structure requires that all of the activities of one phase need to be completed before beginning any of the activities of the next phase. Industry experience suggests that this is rarely the optimal approach as many significant risks are often left undiscovered until late in the architecture implementation process. In particular, the plan prescribes the development of a baseline architecture before beginning any target architecture activities. In fact, many useful activities for developing a target architecture can be performed in conjunction with the development of the baselining efforts, including identification of source documents for enterprise standards, establishing target architecture development working groups and establishing the relevant time horizons for the target architecture.	**Accepted**
PAM	5	1st paragraph. Change Reference 3 to Reference 2. Reference 3 is a draft regulation and is not a governance policy memo. However, Reference 2 is a Secretary of the Army memo. If you agree with the changes, there are no other references to Reference 3 (Draft AR 5-xx) in this pamphlet. This means you will need to either make reference to Reference 3 in the basic memo or delete Reference 3 and renumber subsequent references from 3 through 16.	**Accepted**
PAM	5	Table 1. At present, the performance goals associated with this initiative appear to be focused on improving OMB grading of Army Exhibit 300 submissions. While we recognize this is one worthy objective, it may not be the most useful for metric for gauging the true success of the Army's transformation efforts. In particular, the recent GAO assessments of the DoD's modernization efforts focus on specific problems with organizational inefficiencies, including redundant acquisitions, logistical support problems, an inability to achieve unqualified financial audits and other issues. We would argue that addressing these concerns are more relevant performance metrics for the transformation effort than Exhibit 300 grading.	**Not Accepted**

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Document	Section	Comment	Assessment
PAM	5	Figure 2. There are no dated timelines, phases appear to be linear, should be spiral. Recommend either a calendar timeline or a spiral timeline be developed.	**Not Accepted**
PAM	5	1st Bullet: Reference 3 is AR 5-xx. That document does not address transformation strategy; but defines management structure and roles of responsibility. Recommend correcting reference.	**Not Accepted**
PAM	6.1	Figure 3 – PEO/PM box implies all these investments are under a PEO/PM – are they?	**Accepted**
PAM	6.1	Performance Measures: address incremental targets for spiral improvement.	**Accepted**
PAM	6.1	Transformation enablers, particularly mission area and domain-based governance structure, do not appear to provide sufficient cultural thrust for the intended transformation. BMSI has already recognized that its initial domain structure reinforced existing stovepipes and did not provide adequate motivation for enterprise transformation. Drawing upon BMMP lessons learned, at least one other major Government agency outside DoD has moved to greatly increase upfront and on-going cross-domain integration activities. Furthermore, without significant emphasis on real enterprise integration from the outset, the Business/Warfighter/Intel/EIE mission area split can only serve to reinforce existing Army cultural boundaries. A significant effort to develop and promote enterprise wide, transformational mission threads along with <u>explicit and persistent integration activities</u> built into the governance structure could be one way of stimulating the positive cultural energy needed to power the transformation.

In addition, there does not appear to be any significant examination of the existing disconnected, Army processes that sustain cultural barriers to the effective use of architectures, performance measures and portfolio management as vehicles for transformation. The requirements/capabilities, resourcing and acquisition/development processes that drive change within the Army (and likewise across DoD) each have their own distinct communities. These processes and communities differ across mission areas and even within domains. As a foundational transformation enabler, a common, integrated understanding is needed of these processes, along with a common language to link architectures, performance measures and portfolio management as transformation tools, policy to enforce usage of these tools, and effective decision support capabilities. The DoD EA Reference Models may provide the common language but the other fundamental enablers appear to be lacking. | **Accepted** |
| PAM | 6.1 | In the Performance Measures section, we suggest that the Government consider recasting the Threat-based language to utilize more Capabilities-based language.
Update: In Section 6.1, Page 9, The following Text appears: "Performance Measures to enable | **Accepted** |

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Document	Section	Comment	Assessment
		relevant and ready forces and to be positioned to respond to changing threats, the Army Enterprise must continually evolve." As stated in our comments, the "trend" in DoD is moving away from threat-based and toward capabilities-based planning. We all know it is still the development and evolution of capabilities due to emerging threats but current leadership seems to not like the term "threat". The sentence might be reconfigured to reflect this in the following manner: "The Army Enterprise must continually evolve and expand its capabilities in order to enable a relevant and ready force." This statement infers that by evolving and expanding capabilities, the applied force will be relevant to, and ready for, any threat.	
PAM	6.1	Paragraph 9. Domain Strategy and Performance Measures – recommend adding language to show benefit to owners. Example: Domain owners will be able to explicitly assess the tradeoffs among competing investment opportunities in terms of their benefits, costs, and risks.	**Accepted**
PAM	6.1	Domain Strategy (pg 9): Does this framework encompass all PEOs/PMs?	**Not Accepted**
PAM	6.1	Performance Measures (pg 10: 3rd Paragraph): This note provides some insight into the separation of responsibilities between AEIOO and domain owners; however, it also indicates that AEIOO is only a reporting/policy entity that simply reports to Sec Army. Is this AEIOO desired or assigned role? It seems a bit inconsistent with the governance document.	**Not Accepted**
PAM	6.1	We suggest the Government incorporate more discussion of the As-Is environment (to help complement the To-Be environment). This will help assess OMB's scoring methodology since the OMB requires a Transition Approach (which depends on an As-Is environment that will be transitioned to the To-Be environment).	**Not Accepted**
PAM	6.1	As part of defining Missions, Goals, and Objectives - we suggest that the Government incorporate some discussion of "how" strategies (and the related discussion of potential initiatives) in addition to the "whats". **Update:** After reviewing the Enterprise Transformation Guide, specifically, the Transformation Strategy Template document, suggest withdrawing the comment. Strategies and performance objectives are addressed as active and measurable mechanisms for meeting goals and objectives in this guide/template.	**Not Accepted**
PAM	6.1	Paragraph 9, 4th Sentence: Recommend adding language to have both the CIO and CFO certify the IT Exhibit submitted to OSD.	**Not Accepted**
PAM	6.1	Baseline Portfolio - recommend introducing language regarding development of the exhibit 300s at this point.	**Not Accepted**

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Document	Section	Comment	Assessment
PAM	6.2	"To-Be" Architecture: Need to identify incremental implementation opportunities.	**Accepted**
PAM	6.2	Third (Unnumbered) Para: Replace the sentences starting with "Domains should…" with "Domains should coordinate with the three Executive Architects (TRADOC/ Operational, ASA (ALT)/System, CIO G-6/Technical) to achieve integration of architectures. Additionally, domains should work with the AEIOO to ensure synchronization of business processes with operational (warfighting) capabilities to ensure consistency and compliance with the Army Enterprise Architecture (AEA)."	**Accepted**
PAM	6.2	Sixth (Unnumbered) Para: After "…institutional Army." Add: "Examination and analysis of Operational Architectures provides the foundation for development of business rules and subsequent integration with System and Technical architecture."	**Accepted**
PAM	6.2	An important issue to be addressed in the development of an EA is how the model and governance processes will support a hierarchical structure. For example, how much freedom will lower levels of the Army organization have to refine the structure of the highest-level enterprise architecture? How much freedom will lower levels of the organization have to augment the Army EA with additional standards, or to redefine the framework to incorporate additional types of information within the baseline and target architecture that are unique to that organization?	**Accepted**
PAM	6.2	Performance Measures section, first paragraph, last sentence change to read as: The Business Domains will maintain the performance measures separate from this pamphlet.	**Accepted**
PAM	6.2	41st Sentence: With limited resources recommend adding language that mission driven does not mean lopsided resource allocation. All requirements must be addressed to prevent "breaking" critical business and EIE requirements. (It does no good to build a strong spear point if the shaft to support it is broken)	**Accepted**
PAM	6.2	Fourth (Unnumbered) Para: Delete "…in alignment with the BCA and LandWarNet Architecture". The AEA is comprised of the Army Business Enterprise Architecture (BEA), the Battle Command Architecture (BCA), and the LandWarNet Architecture.	**Not Accepted**
PAM	6.2	A mechanism is needed for aligning performance measures with the evolving missions and goals of the Army, and leveraging existing measures, best practices and lessons learned. To create a community that embraces change, there is a need across Phase 2 and subsequent Phases to reinforce the development, reuse and adoption of increasingly challenging performance measures. Performance measures and metrics could be incorporated into an Enterprise Performance Reference Model, yet governance incentives are needed to promote that practice, and its widest dissemination across the enterprise.	**Not Accepted**
PAM	6.2	Portfolio Management (Analysis, Selection, Control and Evaluation) only reiterates Sec of Defense	**Not Accepted**

Document	Section	Comment	Assessment
		guidance. Recommend adding the following language – **Analysis** – Domain owners will conduct mission analysis within the framework of the Army enterprise architecture and long-range strategic goals. In turn, mission analysis contributes strongly to the evolution of strategic planning and architecture development. It estimates the resources the Army will likely be able to commit to each mission need, in competition with other needs, within the constraint of a realistic projection of future budget authority. The resource estimate becomes a "placeholder" until the mission need is approved. A mission analysis should identify the drivers (i.e. organization mission, vision, goals, objectives, and tactical plans.) Once the key drivers have been identified, a requirements analysis will be conducted. The requirements analysis identifies how personnel conduct business activities in order to fulfill mission requirements, meet objectives and perform plans. **Selection** - Domain owners ensure the IT investments that best support the mission and the Army approach to enterprise architecture, are chosen and prepared for success. Individual investments are evaluated in terms of technical alignment with other IT systems and projected performance as measured by Cost, Schedule, Benefit, and Risk (CSBR). **Control** - Domain owners through timely oversight, quality control, and executive review ensure that IT resources are conducted in a disciplined, well-managed, and consistent manner. Investments will be tracked against the components identified in the Domain Risk Assessment and Mitigation plan. Control promotes the delivery of quality products and results in initiatives that are completed within scope, on time, and within budget. Domain owner will regularly monitor the progress/performance of ongoing IT investments against projected cost, schedule, performance, and delivery benefits. **Evaluation** – Domain owners will ensure the IT investment met its performance, cost, and schedule objectives and that ensure IT capital investment management processes improved the outcome of the IT investment. The outcomes are measured by collecting performance data, comparing actual to projected performance and conducting a Post Implementation Review (PIR) to determine the efficiency and effectiveness in meeting performance and financial objectives.	
PAM	6.3	Transition Plan, 3rd Paragraph: Incremental improvements/spirals.	**Accepted**
PAM	6.3	Second para Second line in "To-Be" Architecture, Appendix A does not have a paragraph A1.11. Believe this is a typo .	**Accepted**
PAM	6.4	Third (Unnumbered) Para: After third paragraph, add a new paragraph: • "G-3 will review the portfolio to ensure architecture: • Development is prioritized, synchronized, and integrated to represent the Army position.	**Accepted**

Document	Section	Comment	Assessment
		• Meets Army internal priorities as expressed in The Army Plan, and external priorities in support of other services and Joint needs. • Is delivered in a timely fashion to meet downstream architecture developments and decision milestones."	
PAM	6.4	Second (Unnumbered) Para: The statement concerning the "independent agent" is very vague. Who is the agent, and what is the agent's scope of responsibility?	**Accepted**
PAM	6.4	Fourth (Unnumbered) Para: After "…of the AEA" add "as well as compliance with the provisions of the Clinger-Chen act."	**Accepted**
PAM	6.5	Incremental improvements/spirals. Bulleted List: This is a Corporate Information Management (CIM)-like failing.	**Accepted**
PAM	6.5	Recommend adding to the list of bullets related to continuous transformation, Domain owners should: • Continue to monitor changes in mission • Continue to monitor changes in technology • Adjust portfolio changes based on mission/technology changes	**Accepted**
PAM	7	Incremental improvements/spirals.	**Accepted**
PAM	7	This section needs to contain more details about the budget and resource plan and perhaps a template in the Transformation Guide. For example, not just number of personnel, but also number of work years and number of authorizations. Also add dollars and type (R&D vs. operating) to the list. Susan Wilvert in G1 can help with budgeting for civilian personnel.	**Not Accepted**
PAM	A1.1	How to identify incremental targets (CCA = chunks).	**Accepted**
PAM	A1.1	Page 21. Last (Unnumbered) Para, First Bullet: After "…warfighter needs" add "as documented in operational Architectures."	**Accepted**
PAM	A1.1	Page 21. Last (Unnumbered) Para, Second Bullet: After "…architecture products" add "as outlined in the DoD Architecture Framework (DoDAF) and applicable CJCS directives".	**Accepted**
PAM	A1.1	The DA Pam 5-xx is a classic text book example of DoD AF Architecture. Is the PAM to indicate what the "school" would teach, or what the Army wants / needs? **Clarification from Telecon:** Some of the products (i.e., SV-8, SV-9, SV-10s, SV-11) are too technical/detailed for a high-level transformation effort.	**Accepted**
PAM	A1.1	Is the SV-4 going to be a required DoD AF Product? The SV-4 is the system level product (at a high level it indicates what management system	**Accepted**

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		(equipment) are used for which areas). OV-5 (is a required product in the Appendix A) which indicated which operation needs to happen (people functions). SV-5 (is a required product in the Appendix A). The SV-5 depicts the linkage between the SV-4 and the OV-5. The SV-4 needs are required in order to develop the SV-5. The SV-4 should be a required product.	
PAM	A1.1	Page 22, First Paragraph. Recommend spelling out DoDAF on first use since this is an Appendix and separate from the basic document.	**Accepted**
PAM	A1.1	OV6-C also answers the question "How?" because it portrays the business process flow.	**Accepted**
PAM	A1.1	It has been our experience when dealing with the creation of solutions that take advantage of web services that organizations are reluctant to expose the data. Security and integrity is usually the objective. In a webservices world, through the use of standard protocols those arguments are no longer valid. But the cultural reluctance remains. It should be noted that there should be some policy or governance that mandates that data be released so that accurate performance metrics can be obtained.	**Not Accepted**
PAM	A1.1	The latest DoDAF Guidance eliminated the requirement for "Essential" and "Recommended" products and guides the user to focus on data and use. While this is the case, CJCSI 3170 (JCIDS) calls out certain products it requires in the execution of the JCIDS process because the DoDAF had not been released and 3170 drew its architecture product requirements from the C4ISR AF V2.0 guidance. The intended point is that the EA realm is moving away from "product" based architectures and focusing more on data and use. More importantly, we are focusing on a process that assesses what data is needed in order to USE the EA effectively for activities such as portfolio management, transformation, integration, etc. Determine uses, define required data, attributes and relationships, and produce the products that comprise the content that best facilitates the intended analysis or analytical product(s).	**Not Accepted**
PAM	A1.1	It's very questionable whether requiring the specific DoD AF architectural products defined in Table 3 will enable architecture to be used as a vehicle for transformation and analysis. DoD AF was developed to support acquisition of warfighter platforms and systems. The architectural knowledge gathered through these products is inadequate to bridge the capabilities, resourcing and acquisition processes, let alone the warfighter/business community gap. The Framework Extension Products, through their mappings to the common language of the DoD EA Reference Models and across mission areas, are a big step in the right direction. Work is needed to identify what mappings are explicitly needed from which DoD AF products, and what products are needed in what context to support the	**Not Accepted**

Document	Section	Comment	Assessment
		enterprise transformation. As mentioned above, extensive analytical and decision support capabilities are needed to allow development of architectures to support enterprise transformation.	
PAM	A1.1	Page 24, Under Framework Extension Products, the first listing of All Views, In the Answers the Question block, recommend changing ACP Campaign Objectives to ACP Objectives. Reduce redundancy.	**Not Accepted**
PAM	A1.3	In describing the types of tools available to assist the Army in its transformation goals, the Framework has appropriately refrained from naming specific products or vendors for the categories of tools described. However, in anticipation of the likely need for actual tool selection – whether by individual organizations, the AEIOO, or the Army as a whole – Framework participants would benefit from at least a high-level set of features, characteristics, or requirements that any tools to be considered should offer. For example, section A1.3 generically describes Modeling and Simulation tools to be used to guide architecture development. While there are many such tools on the market that might seem suitable for the purposes described, any tool to be procured by the Army to facilitate transformation activities should at minimum provide built-in support for key Army and DoD requirements, such as DoD AF. A complete listing of functional requirements supporting each tool category is of course outside the scope of the Framework, but with the tools section organized as an appendix, some additional tool guidance could be added.	**Accepted**
PAM	A1.4	Second Bullet: As used as DRRS (important warfighter tool).	**Not Accepted**
PAM	A2.1	The Army follows the DoD lead in proposing to use the Balanced Scorecard model for performance metrics identification and implementation. Despite the fact that DoD has endorsed the Balanced Scorecard, it is possible that using other federal government performance measurement standards could facilitate the effective use of an management by metrics, and allow greater consistency with other US government agencies and departments. Specifically, beginning in federal fiscal year 2005, all OMB Exhibit 300 submissions under Circular A-11 require IT initiatives to be mapped to four areas of the Performance Reference Model of the Federal Enterprise Architecture. The PRM is designed to fit with the business and service definitions provided in the Business Reference and Service Reference Models, respectively, and therefore may be easier to apply in an appropriate manner to the Army's mission and business objectives than the four perspectives of the Balanced Scorecard (financial, internal, customer, and organizational learning).	**Accepted**

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Document	Section	Comment	Assessment
PAM	A2.2	Page 31. Third (Unnumbered Para, Second Bullet: The sentence should be updated to reflect JCIDS.	**Accepted**
PAM	A2.2	Page 34. The link to AEIOO does not work. It will take the reader to the AKO home page but a logged-in user will not be taken to the reference.	**Accepted**
PAM	A2.2	Second sentence, recommend changing to read "Domain Measures POC" for clarity.	**Accepted**
PAM	A2.2	Identify the data sources for each metric: Is "SARSS1" a typo?	**Not Accepted**
PAM	A2.4	Page 38. Quantitative Assessment: Second (Unnumbered) Para: Question the weights assigned to each criticality criterion. • Leaders would rarely direct un-validated requirements. "Validated Warfighter Requirement" and "Directed by Leader" are normally inseparable. Their combined weight of 40% overwhelms all other criteria. • Weight of 15% is too low for "Feasible, Affordable and Supportable." This criterion should actually be a screen-out criterion that should be used to eliminate proposals that do not meet it. "Recommendation from Audit Report" is assigned 10%. This penalizes all other proposals not recommended by an audit, although they may be of equal or greater value.	**Accepted**
PAM	Format	There should be a purpose paragraph in the DA PAM titled 1-1, not 1a - b, etc. This is per DA PAM 25-40. Paragraph 1-3 is always Explanation of Abbreviations and Terms and refers the reader to the Glossary. If Responsibilities are not listed as required in 1-4, it should be indicate that they are in Chapter 2 or wherever they are located. 1-1, 1-2, 1-3 and 1-4 are required to be named specific titles per DA PAM 25-40.	**Accepted**
PAM	General	The chapters, paragraphs and subparagraphs of each chapter are clearly identified. The subsections of the subparagraphs are not. They should also be numbered to allow easy reference.	**Accepted**
PAM	General	The governance structure proposed in this document is a broad departure from the conventional, organizational-hierarchy-centric operational model to which most in the Army and DoD broadly are accustomed. The success of a horizontally structured governance system such as the mission-and-domain-centric perspective outlined in the draft AR 5-xx and the draft PAM 5-xx depends largely on participants' ability to come to consensus on objectives and priorities, and to collaborate on initiatives that have a broader impact than the organizations which individual participants belong. The GAO has noted in congressional testimony and reports that two major contributing factors limiting business modernization efforts within the DoD to date are a cultural resistance to change and a lack of incentives or accountability mechanisms to ensure that proposed modernization plans are followed through and executed. The Framework materials explain in great detail what should be done to achieve Army Enterprise Transformation, and also generally explain why. More attention should be	**Accepted**

Document	Section	Comment	Assessment
		given, however, to ways to ensure that what should be done will in fact be undertaken and completed.	
PAM	General	The pamphlet seems to include discussion of all relevant management systems/tools and measures. However, the pamphlet needs a lot of editorial work to improve its readability. The pamphlet does not clearly track with the draft regulation. The pamphlet does not specify which HQDA staff offices and Army organizations will setup necessary groups for integrating domain/mission area efforts. The pamphlet needs a complete Table 4 (Enterprise Transformational Guide).	**Accepted**
PAM	General	The document assigns roles and responsibilities and a framework, but there seems to be missing implementation guidance in these documents. Is AEIOO going to develop a SecArmy Policy that outlines how the governance process will be executed? What products or deliverable will AEIOO produce to initiate this process? What is the timeline for implementation?	**Not Accepted**
PAM	General	In general, the DA pamphlet appears to have both a logical and detailed flow to accomplish its desired intent. I do not see any inconsistencies in language or intent other than the above comments; however, I can not comment on the soundness of the Transformational methodology (i.e. whether it conforms to BMMP or industry standards).	**Not Accepted**
Guide (Website)	General	AEIOO has a large number of templates, spreadsheets, etc. associated with their guidelines, and it may be very difficult for a portfolio manager to understand, synthesize and integrate all these perspectives to make good investment and acquisition decisions. Have they considered bringing all of this information together into a decision support and analytical system? If AEIOO has any questions about my comments, they can contact me directly.	**Not Accepted**
Guide (Website)	General	The Army Enterprise Transformation Guide seems to present an effective visual and online representation of the processes and activities involved. Consistent with the "change management" related comments previously raised, it is likely that much of the intended audience for this website will be personnel relatively new to the process (at least in the near term until broader adoption and standardization of the transformation framework). AEIOO could facilitate understanding and adoption of the framework – and potentially reduce training needs – by offering a "How do I use this Guide?" sort of primer area on the site. Some sort of self-directed education or basic training module would help new users decide correctly when to apply various parts of the toolkit. Similarly, a high-level representation of how the Enterprise Transformation Guide relates to and corresponds to other major perspectives on the AEIOO site (Governance, Architectures, Performance Measures, and so forth) would help users "close the loop" in terms of all the resources AEIOO provides. As an example, a link to the Enterprise Transformation Guide on the Performance Measures page provides context and easy navigation. In contrast, the Performance Measures activities listed in	**Not Accepted**

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Document	Section	Comment	Assessment
		the Phases section of the Guide provide access to many documents, but no link to the AEIOO Information page on Performance Measures. This type of navigation-path-dependent difference in locating information on the site can lead to confusion and oversight; a brief review of the site's information architecture should help ensure that all relevant information appears in all logical locations.	
PAM	General	Although there are several documents mentioned throughout the DA PAM there are not any instructions on how long to keep any of them. At a minimum, instructions should say that all documentation should be kept in accordance with disposition instructions per the Army Records Information Systems (ARIMS). Proponent should take steps to ensure that the disposition once decided matches the names & numbers of 5-XX index.	**Not Accepted**
PAM	General	Measures Evaluation Process for objective metrics. a. Although the metrics Implementation approach is intricate, it needs to be extensive and to cover the appropriate areas, which it appears too. Some of metrics may be subjective and others may be given the wrong value based on specific data sources chosen. A significant system will have to be put in place just to capture desired data to determine metrics measurements.	**Not Accepted**
PAM	Various	Numerous instances thru 6.2 - 6.4. All references to "as is" and "to be" related to architecture should be changed to the language being used in the DoD Architecture Framework, V1.0, 9 February 2004, which is based on language used in OMB Circular A-130. The phrase "to be" may be "target" or "objective" and the phrase "as is" may be "current" or "baseline" to be consistent with these two documents. Rationale: Current nomenclature should be used in a new publication.	**Accepted**

Comments Received after Suspense Date

Document	Section	Comment	Assessment
PAM	6.1	Figure 3 shows G-6 involvement, which I didn't think was clear in the regulation.	**Deferred** (received after suspense date)
	6.1	What about the mission area strategy for the other mission areas? (in addition to the BMA)	**Deferred** (received after suspense date)
	6.1	"AEIOO, in collaboration with the Business Domains and the EIE Mission Area, has defined Army Transformation performance measures…"	**Deferred** (received after

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Docu ment	Section	Comment	Assessment
			suspense date)
		It mentions the Business Domains and the EIE mission area but what about the Warfighter area? They bring it in when they hit the phase 4 (establish the enterprise) to ensure they meet the warfighter needs, once transformation is complete. But as they transform, shouldn't they be concerned that they're heading in the right direction?	
	6.2	Domains "should" work with CIO/G-6 on the to-be architecture. Shouldn't that be must? They must do other things, isn't working with CIO/G-6 just as important?	**Deferred** (received after suspense date)
	6.2	"Development of performance measures and target metrics must include a consequence management plan." Who does this?	**Deferred** (received after suspense date)
	6.3	Is there an overall transition plan to show how all the parts fit together? Not readily apparent here.	**Deferred** (received after suspense date)
	6.3	Reference pg 16, Enforcing Compliance with Statutory Requirements, The paragraph fails to address the requirement for a Service Level single domain(s) POC (i.e. CIO/G6). The POC would be the single Service Level focal point to petition and approve requests before they are forwarded to the OSD domain manager. A central POC is required to ensure integration between domains. Without central POC approval, domains will not readily know what other internal Army domains are doing or the secondary effects that they may have on each other (e.g. A system that is functioning as a Logistics system that has a secondary function as Financial). Individual Army domains should not go to OSD directly without a single point of approval within the Army.	**Deferred** (received after suspense date)
	6.4	Reference pg 18, OMB Scores, statement is misleading. Reword to read: "Scores on OMB Exhibit 300s should be continuously improving as a result of the portfolio management and architecture efforts. All programs in all scored sections of the Exhibit 300 should receive a score of at least 3 with the exception of the Security section that mandates a score of 4 to pass. Any program that receives a score of less than 4 in Security and a score 31 or less overall, warrants an evaluation of corrective action or should be evaluated by the Business Domain for further funding."	**Deferred** (received after suspense date)
	A1.1	Should one of the questions be what activities do they interface with and how? In the para below starting "A valid architecture…" they talk about clearly identifying coupling to external communities of interest but what about internal COI's? On the first bullet of page 22 they mention collaborate between mission areas and domains to ensure consistent and integrated products. Don't they have to ask the question first?	**Deferred** (received after suspense date)

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Docu ment	Section	Comment	Assessment
	A1.1	It may be included in another report (I'm not familiar with the reports) but it appears that systems interface isn't a required report.	**Deferred** (received after suspense date)
	A1.7	Reference pg 26, Information Technology Budget (ITB), Change the 1st sentence to read: "The ITB contains financial and business case information about Army systems/programs."	**Deferred** (received after suspense date)
	A2	Doesn't appear that Warfighters are sufficiently included to make sure they're heading in the right direction.	**Deferred** (received after suspense date)
	General	Due to the fact that MID 918R has not been signed, it is premature to assign duties/ responsibilities to the ASA-FM as the Business ....etc. In this regard, the following should be removed from the draft until MID 918R is signed and published: a. pg. 4; # (10) b. pg. 8, Para 6.1, under Transformation Governance Structure, 2nd paragraph, "The Assistant Secretary of the Army, Financial Management .... etc. c. pg. 9, under Mission Area Strategy, The ASA(FM&C) has the responsibility .... etc. d. pg. 12, under To-Be Architectures, 3rd Para, "ASA(FM&C), as the Business Mission Area Lead .... etc. e. pg. 14, under Change Management Plan, 3rd Para, "ASA(FM&C) is responsible for developing .... etc..	**Deferred** (received after suspense date)